Alabama Department of Public Health

Office of Radiation Control

Rule 420-3-26-.15 Compliance Checklist # 3

The new Alabama rules for the enhanced physical security of radioactive materials are required to be fully implemented by March 19, 2016 and will take the place of the Increased Control Orders previously issued by the Office of Radiation Control to certain Alabama licensees. To assist licensees in preparing for the changes, we will be providing periodic checklists for you to measure your progress toward compliance with the requirements of Rule 420-3-26-.15 of the Alabama Administrative Code.

3 – LLEA, Transportation and Logistics 1. Licensees shall coordinate with the LLEA at least every 12 months or when changes to the facility design or operation adversely affect the potential vulnerability of the licensee's material. 420-3-26-.15(16) The licensee is required to coordinate with the LLEA at least every 12 months and any other time when there are changes in the facility design or operations. The rule relaxes the requirement to have a pre-arranged plan with LLEA but does require the licensee to document its efforts to coordinate with the LLEA. 2. Licensees shall verify that they are shipping affected radioactive materials to an individual who is licensed to possess those materials, and provide advance notice of the shipment. 420-3-26-.15(23) Licensees nationwide are responsible to ensure that materials they are transferring are received only by those individuals who are licensed to receive them. This verification is typically done by receiving a copy of the recipients license, and verifying the provisions of that license with the issuing regulatory authority (Agreement State or NRC). Keep documentation of the verification for three years. 3. Shipments of affected quantities of radioactive materials are subject to physical security requirements during transportation. 420-3-26-.15(24) Generally, the shipping licensee is responsible for ensuring the physical security of affected radioactive materials while in transit. This responsibility MAY be passed to the recipient if the recipient has agreed in writing to accept that responsibility. 4. Licensees shall pre-plan and coordinate shipments of radioactive materials subject to physical security requirements and provide notification of shipment departure, arrival, and/or any problems that arise during transit. 420-3-26-.15(25) All shipments must be coordinated between the shipper and the recipient, with prescribed timeframes for reporting that a shipment has reached its destination. There are some additional requirements for shipment of Category 1 materials, which are outlined in the regulations. All coordination and reporting is to be documented, with those records retained for at least three years.

If you have any questions about the new security rules, please contact one of the following individuals:

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